

# INDEX

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DOC. #	DATE	EXEMPTION 5 U.S.C. 552 (b)	FROM/TO	RE:
✓ 001	3/11/91	<del>5</del> <i>1 page</i>	<i>advisory work product</i> Memo: J. Snyder to C. Hayden	Shaffer Discovery
✓ 002	1/16/90	<del>7</del> <i>except 2 pages</i>	Memo: Crump-Weiner to D. Clay	<i>enforcement can be held</i> <del>Ceiling Increase Request</del> for Shaffer Equip...
✓ 003	none	<del>7(A)</del>	Letter: Harrel to R. Flye	Shaffer Equip. Site
✓ 004	4/16/84	5	Memo: J. Seif to Dr. Porter	Exemption from Six Month Statutory Limit for CERCLA Removal at Shaffer Equip. Co. Site
✓ 005	8/15/85	5	Memo: R. Coran to J. Seif	\$1,000,000 Exemption to Request for CERCLA Immediate Removal Action at Shaffer Equip. Site
✓ 006	5/21/90	7(D)	Letter: Bowyer to E. Johnson	Shaffer Site
✓ 007	none	<i>[enforcement work product]</i> <del>8</del> <i>7(c)</i>	<i>confidential attorney work product</i> Draft Order	In the Matter of: Berwind Land Co.
✓ 008	7/25/85	5	Bulletin: Dorrlor	PCB Extraction from Soil
✓ 009	5/25/88	4	Letter: OHM to D. Lopez	Delivery Order #7445-03- 007
✓ 010	6/25/90	7(A)	Letter: Johns Hopkins Univ. to EPA	Shaffer Equip. Site
✓ 011	none	2	Special Bulletin	Shaffer Equip. Site
✓ 012	7/23/80	7(A)	Letter: Johns Hopkins Univ. to Mr. Shaffer	Shaffer Equip. Site
✓ 013	10/15/82	4	Invoice #S10-45-82 Jerry's Equip. Co.	Shaffer Equip. Site
✓ 014	4/06/83	4	Invoice #S4-12-83 Jerry's Equip. Co.	" " "
✓ 015	5/28/86	4	Invoice #S5-87-86 Jerry's Equip. Co.	" " "

constituent of the dielectric fluid in the transformers, and the name and telephone number of the person to contact in the event of a fire involving the equipment.

Following Respondent's failure to register its transformers as required by law, the Philadelphia Fire Department (P.F.D.) requested in writing the information described above from Respondent, stating:

The purpose of this regulation is to provide responding agencies with a complete PCB transformer inventory, so that, in the event of a PCB fire-related incident or spill, prompt and efficient action may be taken to alleviate potential damage to human health or the environment.

Attachment 7, letter from Lieutenant Edwin Baxter, P.F.D.

(Exhibit III-1 accompanying Respondent's prehearing exchange).

After being reminded of the registration requirement, Respondent submitted its PCB transformer registration; the P.F.D. subsequently acknowledged receipt of Respondent's submission and reminded Respondent to inform the P.F.D. of changes regarding Respondent's PCB equipment (Attachment 7, Exhibits III-2 through III-8 accompanying Respondent's prehearing exchange).

Complainant's allegation regarding these violations in Paragraph 23 of the Complaint states:

23. The November 29, 1989 EPA inspection and review of Respondent's records revealed that the Respondent did not register its PCB Transformers located at Respondent's facility with fire response personnel with primary jurisdiction until September 9, 1986 and not by the December 1, 1985 deadline specified in 40 C.F.R. § 761.30(a)(i)(vi).

Attachment 5, p. 5; see also IR, p. 5. In its Answer, Respondent replies: